February 16, 2000

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Mr. Michael McAteer
Remedial Project Manager
Office of Superfund
U.S. Environmental Protection Agency – Region V
HSRW-6J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Re: Sauget Area 1 Sites Site I Trenching

Dear Mike:

As we discussed on the phone today, I want to restate Cerro Copper Products Co.'s position concerning the proposed investigatory trenching in Site I by the U.S.EPA and to provide possible options.

Cerro's overriding concern is for the health and safety of our employees. Cerro first raised these concerns in an August 26, 1999 letter to Solutia after we were approached by Solutia to perform the trenching. I believe Solutia forwarded that letter to you. These concerns were discussed at our September 30, 1999 meeting with you and Solutia. At that meeting Cerro agreed to withhold its final decision to allow trenching until we were given the opportunity to review data from the less intrusive investigation measures, particularly groundwater sampling, that were planned at the sites. Last Friday I was given only a magnetometer and soil gas survey summary drawing.

Last week Cerro was again asked if trenching would be allowed at Site I. Cerro appreciates the Agency's desire to characterize the site, especially characterizing what is being initially considered the "hot spot." As a PRP, Cerro actually stands to benefit if, in trenching, the Agency uncovers evidence of other PRPs or further strengthens its position concerning current PRPs.

To help resolve our concerns about our workers' health and safety and the Agency's needs for further characterization of the landfill, Cerro would further consider allowing trenching if the Agency could assure Cerro that any air release resulting from the trenching would not adversely affect Cerro employees. We understand that temporary structures or foaming over the area to be trenched are possible alternative



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methods to contain or minimize noxious and harmful releases. However, we would look to the Agency to propose the best methods for protection since it is more experienced in these matters. I have provided some manufacturer's literature on temporary containment structures that might address Cerro's concerns. Additionally, Cerro would like to have the groundwater data that was promised to us in September.

Please contact us if you would like to discuss further.

Very truly yours

CERRO COPPER PRODUCTS CO.

Joseph M. Grana

Manager of Environmental, Energy and Health Services Group

cc: R. Ricci (Lowenstein) M. Light (Solutia)



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